

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

|                       |   |                        |
|-----------------------|---|------------------------|
| IN RE:                | : | CASE NO. 11-13910      |
| THOMAS L. NEYER, JR., | : | CHAPTER 7              |
| Debtor.               | : | JUDGE BETH A. BUCHANAN |

**NOTICE OF MOTION OF BANK OF AMERICA, N.A. FOR MOTION FROM RELIEF  
FROM AUTOMATIC STAY**

Bank of America, N.A. ("BoA") has filed papers with the court seeking modification and relief from stay.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the court to grant the motion without a hearing, or if you want the court to consider your views on the motion, then on or before **July 29, 2011**, you or your attorney must:

File with the court a written response, explaining your position at:

U.S. Bankruptcy Court  
Southern District of Ohio  
221 E. Fourth Street  
Atrium Two Suite 800  
Cincinnati, OH 45202

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

John J. Rutter, Esq.  
Roetzel & Andress, LPA  
222 S. Main Street  
Akron, OH 44308

If you do not respond in writing the Court may grant the relief requested without a hearing. **If you respond in writing then you must attend a hearing, date and time to be determined by the Court pursuant to its order, which will be held at the U.S. Bankruptcy Court, 221 E. Fourth Street, Atrium Two Suite 800, Cincinnati, Ohio 45202.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or have objection and may enter an order granting that relief without a hearing.

Date: July 8, 2010

Signature: /s/ John J. Rutter

### **CERTIFICATE OF SERVICE**

This is to certify that the Notice of Motion of Bank of America, N.A., for Approval of a Joint Stipulation and Order Granting Limited Stay Relief to Liquidate Claims in Pending State Court Proceedings was electronically transmitted on July 8, 2011 via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice List:

- Asst US Trustee (Cin)   ustpregion09.ci.ecf@usdoj.gov
- Eliot G Bastian   ebastian@fbtlaw.com
- Robert A Goering   bob@goering-law.com
- Cara R Hurak   churak@graydon.com
- Michael J O'Grady   mjogrady@fbtlaw.com,  
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- Elliott Polaniecki   elliottp@cinci.rr.com, epolaniecki@ecf.epiqsystems.com
- John J Rutter   jrutter@ralaw.com

/s/ John J. Rutter  
John J. Rutter